

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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**NOTICE OF MOTION FOR  
PROTECTIVE ORDER**

In Re:

JOHN C. SZUMOWSKI

Debtor.

Case No.: 10-12431-rel  
(Chapter 13)

Assigned to:  
Hon. Robert E. Littlefield, Jr.  
Chief Bankruptcy Judge

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Please take notice that BAC Home Loans Servicing, LP (BAC), a secured creditor of Debtor, by the undersigned attorneys, will move this Court on the 26th day of May 2011 at 9:15 a.m. or as soon thereafter as counsel can be heard, at the United States Bankruptcy Court, 445 Broadway Suite 327, Albany, NY 12207 for a Protective Order pursuant to Section 107(b) of the Bankruptcy Code and Rules 7026(c) and 9018 of the Federal Rules of Bankruptcy Procedure and for such other relief as the Court may deem proper.

**PURSUANT TO BANKRUPTCY RULE 9014 AND LOCAL RULE 9013.1(c), IF YOU INTEND  
TO OPPOSE THE MOTION, YOU MUST SERVE ON THE MOVANT'S COUNSEL AND FILE WITH  
THE CLERK OF THE BANKRUPTCY COURT, WRITTEN OPPOSITION TO THE MOTION NOT  
LATER THAN SEVEN (7) DAYS PRIOR TO THE RETURN DATE OF THIS MOTION. IN THE  
EVENT NO WRITTEN OPPOSITION IS SERVED AND FILED, NO HEARING ON THE MOTION  
WILL BE HELD BEFORE THE COURT ON THE RETURN DATE AND THE COURT WILL  
CONSIDER THE MOTION AS UNOPPOSED.**

DATED: April 19, 2011  
Amherst, New York

Yours, etc.

By:

*Natalie A. Grigg*  
Natalie A. Grigg, Esq.  
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TO:

JOHN C. SZUMOWSKI  
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Schenectady, NY 12302-6740

Debtor

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Attorney for Debtor

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Chapter 13 Trustee

Lisa Penpraze, Esq.  
Office of The U.S. Trustee  
74 Chapel Street  
Suite 200  
Albany, NY 12207

U.S. Trustee